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November 22, 2019

Hon. Andrew T. Baxter
United States Magistrate Judge
United States District Court
Northern District of New York
Federal Building and U.S. Courthouse
P.O. Box 7396
Syracuse, NY 13261-7396

Re: *Burinska v. SUNY, et al.*
19-CV-564 (USDC) (NDNY)
(MAD) (ATB)

Dear Judge Baxter:

I represent the plaintiff in the above-referenced action. I respectfully request a thirty (30) day extension of the uniform pretrial deadlines in the above-referenced action (Dkt. 10), as set forth below, based upon the time necessary to review the voluminous number of records recently produced by the defendants, the defendants' extensive privilege log and associated redaction and withholding of records, and based upon the demands of my State and federal practice. Defendants' counsel consents to this request.

By way of background, the Stipulated Confidentiality Agreement and Protective Order was entered on October 18, 2019 (Dkt. 16), and on October 21, 2019, defendants electronically emailed documents in response to plaintiff's discovery demands, consisting of 3,538 pages. By letter dated October 21, 2019, defendants mailed responses to plaintiff's discovery demands together with a privilege log identifying 157 documents that were withheld or redacted from defendants' document production. Based upon the demands of my State and federal practice, and the date when I received the voluminous records and privilege log, additional time is necessary for me to adequately review the documents and privilege log in order to properly consider joinder of parties and amendment of the complaint, complete discovery, expert reports and rebuttal, and motion practice, including the filing of an anticipated motion for summary judgment.

Prior to the entry of the confidentiality agreement/protective order and receipt of defendants' document production, the Court previously granted an extension of the joinder/amendment deadlines from October 11, 2019, to December 2, 2019 (Dkt. 14). No other extensions have been granted in this action.

Based upon the above, I respectfully request a thirty (30) day extension of the uniform pretrial deadlines in the above-referenced action, as follows:

Joinder of parties/amendment of pleadings, from December 2, 2019, to January 2, 2020;

Discovery, from June 15, 2020, to July 15, 2020;

Experts - plaintiff, from March 17, 2020, to April 16, 2020;

Experts - defendants, from May 1, 2020, to June 1, 2020;

Expert rebuttals, from May 18, 2018, to June 17, 2018; and

Motions, from August 14, 2020, to September 21, 2020.

Additionally, the parties respectfully request an additional thirty (30) day extension of the mediation completion date, from December 13, 2019, to January 13, 2020, based upon the defendants' request for additional settlement information from plaintiff to enable defendants to more fully consider plaintiff's settlement demand and obtain settlement authority, if any, to participate in mediation. The parties are working towards this goal, and plaintiff has engaged experts to this end.

Thank you for your consideration.

Very truly yours,

Jeffrey P. Mans

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cc: Shannan C. Krasnokutski, AAG (*via ECF*)